

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:91-CR-00001-CDP-6
)	
RAYMOND AMERSON,)	
)	
Defendant.)	

**SECOND MOTION FOR ADDITIONAL TIME TO DECIDE TO SUPPLEMENT PRO SE
REQUEST FOR COMPASSIONATE RELEASE**

NOW COMES Assistant Federal Public Defender Brocca Morrison respectfully requesting an additional 30 days, up to and including January 28, 2021, in order to supplement Defendant Amerson's *pro se* Motion for Compassionate Release (Docs. 394). In support thereof, counsel states:

1. Defendant filed a *pro se* Motion for Compassionate Release on October 14, 2020.
2. Counsel entered her appearance in this matter on October 22, 2020.
3. Counsel needs additional time to review certain records in this case, including BOP records, in order to determine whether to supplement Defendant's *pro se* motion. Defendant has been incarcerated for many years and thus has far more records accumulated than the average compassionate release movant. Therefore, counsel needs additional time to review those records.
4. Moreover, counsel has additional obligations representing indigent clients facing pending criminal charges in the Eastern District of Missouri.
5. This motion is made in good faith and not for any dilatory purpose.

WHEREFORE, for the reasons stated above, counsel respectfully requests this Honorable Court grant an additional thirty (30) days (through January 28, 2021) in order to determine whether to supplement Defendant's *pro se* Motion for Compassionate Release.

Respectfully submitted,

/s/Brocca L. Morrison

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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2020, the foregoing was served by operation of the Court's electronic filing upon Assistant United States Attorney Tiffany Becker.

/s/Brocca L. Morrison

Brocca L. Morrison